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6 *Attorney for Plaintiff*

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 KIM BIRON, an individual,

11 Plaintiff,

12 vs.

13 WYNDHAM VACATIONS OWNERSHIP, INC.,
14 doing business as a foreign corporation,

15 Defendants.

CASE NO: 2:19-cv-01695-RFB-EJY

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANT'S
MOTION FOR SUMMARY
JUDGMENT
(Fourth Request)**

16 COMES NOW, Plaintiff, KIM BIRON, ("Plaintiff"), by and through her counsel, the law
17 firm of Hatfield & Associates, Ltd., and Defendant WYNDHAM VACATIONS OWNERSHIP,
18 INC. ("Defendant") by and through its counsel, Amy L. Thompson, Esq., of the law firm of Littler
19 Mendelson, P.C., hereby stipulate and agree to extend the time for Plaintiff to Respond to
20 Defendant's Motion for Summary Judgment (ECF #49). This request is submitted pursuant to LR
21 IA 6-1, 6-2 and LR II 7-1 and 26-4 and is the Plaintiff's fourth request for an extension of time for
22 Plaintiff to respond to Defendant's Motion for Summary Judgment.¹

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24 Good cause exists for this extension, as the parties were exploring settlement negotiations.

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28 ¹ This shall be Plaintiff's final request for an extension to respond to Defendant's Motion for Summary Judgment.

1 Accordingly, Plaintiff shall have up to and including July 23, 2021, to respond to
2 Defendant's Motion for Summary Judgment (ECF #49). Defendant's reply to Plaintiff's response
3 will be extended to August 30, 2021.

4 Dated this 2nd day of July, 2021

Dated this 2nd day of July, 2021

5 **HATFIELD & ASSOCIATES**

LITTLER MENDELSON, P.C.

6 */s/ Trevor J. Hatfield*

/s/ Amy L. Thompson

7 By: _____
8 Trevor J. Hatfield, Esq. (SBN 7373)
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13 *Attorney for Plaintiff*

By: _____
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Email: athompson@littler.com
Attorneys for Defendant

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15 **IT IS SO ORDERED:**

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18 _____
19 **RICHARD E. BOULWARE, II**
20 **United States District Court**

21 DATED this 6th day of July, 2021.
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Certificate of Service

I certify that on the 2nd day of July, 2021 electronically filed **STIPULATION AND ORDER FOR TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT’S MOTION FOR SUMMARY JUDGMENT (Fourth Request)** with the Clerk of the Court using the ECF system which served the parties hereto electronically.

Dated this 2nd day of July, 2021 By: /s/ Freda P. Brazier
An employee of Hatfield & Associates, Ltd.